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September 22, 2023

VIA ECF

The Honorable Jessica G.L. Clarke, USDJ
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Overton v. Source Receivables Management LLC
Case No. 1:23-cv-05344-JGLC
Motion on Consent for Adjournment of Initial Conference &
Leave to File Amended Complaint

Dear Hon. Clarke:

As the court is aware, this office represents Ms. Kim T. Overton, ("Overton" or "Plaintiff") the Plaintiff in the above-referenced action.

Plaintiff respectfully submits this letter to request a second 21-day adjournment of the conference currently scheduled for Wednesday, September 27, 2023 at 3:00PM to a date and time convenient for the court. The undersigned also requests an additional 21- day extension of time to file Plaintiff's first amended complaint pursuant to Rule 15(a)(2).

The adjournment is not sought for reasons of delay or other improper purpose. Counsel for the Defendant consents to this adjournment request. Plaintiff requests the extension of the schedule to accommodate Plaintiff's counsel scheduling conflicts and the fallout from a death in the undersigned's family.

The undersigned also notes that Defendant also consents to allowing Plaintiff 30 days to file an amended complaint pursuant to Rule 15(a)(2).

This is not a frivolous request, and this enlargement will have no impact on other deadlines in the case, as there are no other deadlines set by the court.

Plaintiff thanks the court in advance for its courtesy and consideration in this matter.

Sincerely,

/s/ Abel L. Pierre
Abel L. Pierre, Esq.
Counsel for Plaintiff

The deadline for Plaintiff to file an Amended Complaint is **October 10, 2023**. The parties must submit their joint letter and proposed case management plan, see ECF No. 5, no later than **October 17, 2023**. The initial pretrial conference scheduled for September 27, 2023 is ADJOURNED to **October 24, 2023** at 3:00 p.m. The conference will be held via Microsoft Teams.

Dated: September 25, 2023
New York, New York

SO ORDERED.

Jessica Clarke

JESSICA G. L. CLARKE
United States District Judge

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